

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

JOSEPH JEROME WILBUR, a Washington
resident; JEREMIAH RAY MOON, a
Washington resident; and ANGELA MARIE
MONTAGUE, a Washington resident,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

CITY OF MOUNT VERNON, a Washington
municipal corporation; and CITY OF
BURLINGTON, a Washington municipal
corporation,

Defendants.

NO. 2:11-cv-01100 RSL

DECLARATION OF ~~ALLISHA BARTER~~
~~ALLISHA BARTER~~ ALLISHA BARTER

ALLISHA BARTER

I, ~~ALLISHA BARTER~~, declare as follows:

1. I am over the age of 18 and have personal knowledge of the facts stated below.
2. I understand the requirements of serving as a named class representative in this matter. I am willing to serve as a class representative and am committed to prosecuting vigorously this case on behalf of the class.
3. I currently am represented by Mr. Richard Sybrandy in a criminal case in Mount Vernon Municipal Court that I have pled guilty to but have not been sentenced yet.

1 4. The only time I spoke with Mr. Sybrandy was when he told me to plea guilty. I
2 only spoke with him for about 5 minutes and it was in the courtroom with others present. In
3 fact, until that moment I did not know that he was my attorney.

4 5. Mr. Sybrandy told me to accept the guilty plea because I had been convicted of
5 similar crimes in the past. When I asserted my innocence he continued to direct me to take the
6 guilty plea and just get it over with.

7 6. At the guilty plea hearing I stood at the podium and spoke to the judge myself.
8 While my hearing was in progress Mr. Sybrandy was in the back of the courtroom talking to
9 other people.

10 7. I was supposed to be sentenced on December 6, 2011 but the hearing did not
11 happen and no one informed what was going on.

12 8. I have not spoken to Mr. Sybrandy since he told me to plead guilty, and I do not
13 know what my sentence will be.

14 9. Mr. Sybrandy did not take the time to understand who I was as a client or what
15 my needs were.

16 I declare under penalty of perjury under the laws of the United States and the state of
17 Washington that the foregoing is true and correct.

18 EXECUTED this 7 day of December, 2011 at Mt. Vernon, Washington.

19
20
21 Allisha Barter
22 ██████████ **ALLISHA BARTER**

CERTIFICATE OF SERVICE

I, Toby J. Marshall, hereby certify that on December 9, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Attorneys for Defendants Cities of Burlington, Washington and Mount Vernon, Washington

1 DATED this 9th day of December, 2011.

2 TERRELL MARSHALL DAUDT & WILLIE PLLC

3 By: /s/ Toby J. Marshall, WSBA #32726

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